

SHER TREMONTE LLP

November 4, 2024

VIA ECF AND EMAIL

The Honorable LaShann DeArcy Hall
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Jonathan Goulbourne*
Case No. 22-CR-106 (LDH)

Dear Judge DeArcy Hall:

I represent Jonathan Goulbourne. I write to provide the Court with an update regarding Mr. Goulbourne's SHU ticket, which is one of the matters at issue at the upcoming evidentiary hearing. As Your Honor may recall, on April 23, 2024, Mr. Goulbourne was issued a disciplinary ticket for allegedly threatening bodily harm after he complained about not receiving his medication following his emergency appendectomy. He was sent to the SHU, where he remained for several months. The disciplinary ticket was subsequently rewritten after the undersigned began raising concerns about Mr. Goulbourne's treatment because, as MDC Supervising Attorney Sophia Papapetru admitted, the original ticket was insufficient on its face to sustain the charge. Despite these circumstances, the Disciplinary Hearing Officer at the MDC sustained the charge on May 14, 2024, and, among other things, Mr. Goulbourne was sentenced to loss of 27 days of good-time credit and 120 days of social visits. Mr. Goulbourne appealed this decision to the Bureau of Prisons Regional Counsel. On October 25, 2024, he received word from the Warden at FCI Cumberland that his appeal was granted, and the disciplinary ticket was expunged. I attach the Regional Administrative Remedy Appeal decision to this letter.

Respectfully submitted,

/s/ Noam Biale

Noam Biale
Martin Njoroge

Attorneys for Jonathan Goulbourne

cc: All counsel (via ECF)

REGIONAL ADMINISTRATIVE REMEDY APPEAL
Part B - Response

Date Filed: September 27, 2024

Remedy ID No.: 1209598-R2


You appeal the Discipline Hearing Officer's (DHO) decision of May 14, 2024, for Use of the Threatening Another With Bodily Harm (Code 203). You request the incident report be expunged.

Upon review, the case has been expunged. The record has been updated to reflect this decision.

Your appeal is granted to the extent set forth above. If you are not satisfied with this decision, you may appeal to the General Counsel, Federal Bureau of Prisons, 320 First Street, N.W., Washington, D.C. 20534, within 30 days of the date of this response.

OCT 25 2024

Date



C. Gomez
Regional Director
Mid-Atlantic Region

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WARDEN'S OFFICE